

EXHIBIT 130

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
CONNECTICUT, DELAWARE,
DISTRICT OF COLUMBIA,
HAWAII, ILLINOIS, IOWA, NEW
MEXICO, NORTH CAROLINA,
OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official
capacity as President of the United
States; U.S. DEPARTMENT OF
HOMELAND SECURITY; ELAINE
C. DUKE, in her official capacity; U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES; U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT;
and the UNITED STATES OF
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

1 Pursuant to 28 U.S.C. § 1746(2), I, Sarah Conly, hereby declare as follows:

- 2 1. I am over the age of eighteen and competent to testify herein.
- 3 2. I am employed at the Washington Department of Veterans Affairs (WDVA). My job title
- 4 is Human Resources Director. My position is responsible to manage and integrate the
- 5 human resources and payroll offices statewide. I have administrative responsibility for
- 6 developing, implementing and maintaining a full range of human resource and payroll
- 7 programs and services including planning, recruitment, benefits, leave, compensation,
- 8 contracts, classification, training, disciplinary actions, affirmative action/equal employment
- 9 opportunities, employee and labor relations, complaint investigations, and adherence to
- 10 applicable laws and regulations.
- 11 3. There are at least one employee at the WDVA located at the Washington Soldiers Home
- 12 (WSH) who is a recipient of Deferred Action for Childhood Arrivals (DACA).
- 13 4. One DACA recipient is employed as a Nursing Assistant – Certified (NAC). That
- 14 employee's job description is to assist in delivery of nursing and nursing related care to
- 15 residents of the WSH. In accordance with current standards of practice, the NAC assists or
- 16 supervises assigned residents with activities of daily living, i.e., bathing, dressing,
- 17 grooming, hygiene, toileting and eating at a long term care facility. The NAC promotes
- 18 resident-centered care and ensures that the veterans are treated with dignity and respect.
- 19 5. WDVA spends time and resources to recruit, hire, train, and supervise employees. When
- 20 any employee departs, it creates disruption for our agency and costs us time and resources
- 21 to replace and train that person.
- 22 6. The termination of DACA will be disruptive to operations and cause us to expend additional
- 23 resources.

24 I declare under penalty of perjury that the foregoing is true and correct.

25 Executed on this 21 day of September, 2017

26 
Sarah Conly